

All Cases: Debtor(s) Elisa Arellano Case No. 18-01539 Chapter 7

All Cases: Moving Creditor PROF-2013-S3 LEGAL TITLE TRUST II, BY Date Case Filed 1/18/18
U.S. BANK NATIONAL ASSOCIATION, AS
LEGAL TITLE TRUSTEE

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed _____

Chapter 7: ☐ No-Asset Report filed on _____
☒ No-Asset Report not Filed, Date of Creditor's Meeting: 02/21/2018

1. Collateral
 - a. Home ☒
 - b. Car _____ Year, Make and Model _____
 - c. Other _____
2. Balance Owed as of 01/26/2018: \$226,750.58
Total of all other Liens against Collateral: \$0.00
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$230,000.00, per Debtor's Schedules.
5. Default
 - a. ☒ Total Default as of 01/26/2018
Number of months 52 Amount \$82,847.80
 - b. ☐ Post-Petition Default
 - i. ☐ On direct payments to the moving creditor
Number of months _____ Amount _____
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount _____
6. Other Allegations
 - a. ☐ Lack of Adequate Protection § 362(d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount _____
 - iii. ☐ Rapidly depreciating asset
 - iv. ☐ Other (describe) _____
 - b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. ☐ Other "Cause" § 362(d)(1)
 - i. ☐ Bad faith (describe) _____
 - ii. ☐ Multiple filings
 - iii. ☐ Other (describe) _____
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☒ Surrender
 - iv. ☐ No Statement of Intention Filed

Date: 2/5/2018

/s/ Peter C. Bastianen
Counsel for Movant